



Gideon Orion Oliver

—ATTORNEY AT LAW—

He/him/his

277 Broadway, Suite 1301

New York, NY 10007

1825 Foster Avenue, Suite 1K

Brooklyn, NY 11230

Gideon@GideonLaw.com*

GideonLaw.com

Office: (718) 783-3682

Signal: (646) 263-3495

Fax: (646) 349-2914*

*Not for service

February 28, 2024

BY ECF

Hon. Jennifer L. Rochon
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Kushneir v. Esposito, et al., 14 cv 09148 (JLR)(BCM)

Your Honor:

I am co-counsel for Plaintiff Mark Kushneir. I write jointly with opposing counsel to request a three-week extension, from March 4, 2024, to March 25, 2024, of the date by which the parties must submit the joint letter addressing various issues that the Court directed the parties to brief at the December 13, 2023 pretrial conference. Alternately, the parties ask that the Court extend the current deadline to a date as close to March 25, 2024 as possible. There has been no previous application to extend the March 4, 2024 deadline. The final pretrial conference is scheduled for April 30, 2024. If the Court grants this application, it will not impact other deadlines in the case.

Since the conference at which the Court set the March 4, 2024 deadline, the parties have communicated by e-mail and met and conferred by teleconference and by phone numerous times, most recently yesterday afternoon. We have scheduled another meet and confer for later this week. Although the parties have worked diligently, and we have made much progress discussing the issues the Court directed us to explore and brief in the joint letter, there remains a significant amount of work to be done before we can finalize, exchange, and memorialize our positions in the joint letter.

The parties therefore jointly ask that the Court extend the March 4, 2024 deadline to March 25, 2024, or as close to that date as possible.

Thank you for your attention to this matter.

Respectfully submitted,

Gideon Orion Oliver

Gideon Orion Oliver